

### **REMARKS**

Claims 1-5 and 7-23 are presently pending, of which claims 1, 12 and 23 are independent. Claims 1, 12 and 23 have been amended. No new matter has been added. Applicant believes that the claims are patentable and in condition for allowance as discussed below. Applicant respectfully requests reconsideration of the outstanding rejections in view of the comments set forth below.

#### **I. Rejection of Claims 1-5, 7-19 and 21-23 under 35 U.S.C. §103**

Claims 1-5, 7-19 and 21-23 have been rejected under 35 U.S.C. §103(a) as being anticipated by “MATLAB Report Generator” by Mathworks, Inc (hereafter “MATLAB reference”) in view of U.S. Patent No. 5,708,825 to Sotomayor (hereafter “Sotomayor”) and in view of U.S. Patent No. 6,055,541 to Solecki et al (hereafter “Solecki”).

##### **A. Claim 1**

Claim 1, as amended, recites:

A computer-implemented method comprising:

- performing, using the computer, an analysis or synthesis operation on an executable graphical model representation that includes **executable graphical objects representing a dynamic system for simulation, where executing the executable graphical objects simulates the dynamic system represented by the executable graphical objects;**

- producing, using the computer, a report from the analysis or synthesis operation, while producing the report:

- generating, using the computer, one or more tags for one or more executable graphical objects of the executable graphical model representation provided in an executable graphical model editor program;

- associating, using the computer, the one or more tags with the one or more executable graphical objects of the executable graphical model representation;

- associating, using the computer, the one or more tags associated with one of the executable graphical objects with portions of the produced report corresponding to the one of the executable graphical objects, wherein associating creates **a selectable connection from the one of the executable graphical objects provided in the executable graphical model editor program to the portions of the produced report that correspond to the one of the executable graphical objects, the produced report provided in a document viewer as textual content;**

completing, using the computer, production of the report;  
receiving, using the computer, a selection identifying one of the  
executable graphical objects in the executable graphical model representation  
upon completing the production of the report; and  
displaying, using the computer, a location in the report corresponding to  
the selected executable graphical object in response to the selection on a display  
device.

Applicant respectfully submits that the MATLAB reference, Sotomayor and Solecki, taken either alone or in any reasonable combination, do not disclose or suggest the following feature of Applicant's claim 1: *a selectable connection from the one of the executable graphical objects provided in the executable graphical model editor program to the portions of the produced report that correspond to the one of the executable graphical objects, the produced report provided in a document viewer as textual content where the executable graphical objects represent a dynamic system for simulation, and executing the executable graphical objects simulates the dynamic system represented by the executable graphical objects.*

On page 3 of the Office Action, the Examiner indicates that:

“As outlined in the final, the office position is that Matlab did not expressly recite an executable graphical object, even though a table of contents shown in HTML form would be a set of graphical objects that are executable. It is noted the claims do not say what the execution of the graphical object performs. In contrast, the argued claim limitations are simply "the associating of tags that creates a selectable connection from the object in the program to the portion of the report..." is argued by applicant because they appear to not agree that the combination of Matlab, Sotomayor and Solecki teach the reasonable feature of "associating objects from the report editor program to the report [sic]. To wit, a hyperlinked object is an associated object when it links two locations in a document.”

In light of the Examiner's comments, Applicant amends claim 1 to recite what the execution of the graphical object performs. Specifically, as recited in Applicant's amended claim 1, the executable graphical objects represent a dynamic system for simulation. Accordingly, the execution of the graphical objects performs the simulation of the dynamic system. As further recited in claim 1, a selectable connection is generated from one of the graphical objects to the portions of the produced report that correspond to the graphical object.

Applicant respectfully submits that the combination of the cited references are silent about a **“selectable connection from the one of the executable graphical objects,”** whose execution **“simulates the dynamic system,”** to a portion of text in a document viewer. Specifically, MATLAB, Sotomayor and Solecki, taken either alone or in any reasonable combination, do not disclose or suggest *a selectable connection from the one of the executable graphical objects provided in the executable graphical model editor program to the portions of the produced report that correspond to the one of the executable graphical objects, the produced report provided in a document viewer as textual content where the executable graphical objects represent a dynamic system for simulation, and executing the executable graphical objects simulates the dynamic system represented by the executable graphical objects,* as provided in Applicant’s claim 1.

Regarding “a selectable connection from the executable graphical object provided in the executable graphical model editor program to the portions of the produced report that correspond to the executable graphical object, the produced report provided in a document viewer as textual content”, the Examiner indicates that neither MATLAB nor Sotomayor teaches a graphical model representation provided in an editor program and connecting the objects provided in the editor program to the report as textual content. *See Office Action, page 3.*

However, the Examiner relies on Solecki for the teaching of this feature. *See Office Action, page 3.* Solecki discusses a CAD system with an HTML editor that allows the user to generate a report from a CAD model. *See Col. 4, lines 56-58.* The Examiner asserts that the report of Solecki provides objects allowing the user to jump to any section of the report using hyperlinked objects. The Examiner further notes that the hyperlinked objects are textual content. *See Office Action, page 3.*

As noted by the Examiner, the report of Solecki allows users to jump to various parts of the report using the hyperlinked objects *of the report*. Accordingly, Solecki uses hyperlinks *within* the report to link to parts of the report together. Solecki does not disclose or suggest *a selectable connection from the one of the executable graphical objects provided in the executable graphical model editor program to the portions of the produced report that correspond to the one of the executable graphical objects, the produced report provided in a document viewer as textual content,* as recited in Applicant’s claim 1.

In addition, Applicants respectfully submit that the executable graphical object of Applicant's claim 1, whose execution simulates the dynamic system represented by the graphical object, is not equivalent to the CAD objects discussed in Solecki. Solecki does not disclose or suggest graphical objects that *represent a dynamic system for simulation, where executing the executable graphical objects simulates the dynamic system represented by the executable graphical objects*, as recited in Applicant's claim 1.

In light of the foregoing, Solecki, alone or in any reasonable combination with the MATLAB reference and Sotomayor, does not disclose or suggest *a selectable connection from the one of the executable graphical objects provided in the executable graphical model editor program to the portions of the produced report that correspond to the one of the executable graphical objects, the produced report provided in a document viewer as textual content where the executable graphical objects represent a dynamic system for simulation, and executing the executable graphical objects simulates the dynamic system represented by the executable graphical objects*, as provided in Applicant's claim 1.

Accordingly, for at least the reasons presented above, Applicant respectfully submits that the MATLAB reference, Sotomayor and Solecki, taken either alone or in any reasonable combination, do not disclose or suggest each and every element of claim 1. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 1 under 35 U.S.C. § 103(a).

#### B. Claims 2-5 and 7-11

Claims 2-5 and 7-11 depend from independent claim 1 and, as such, incorporate all of the elements of claim 1. Accordingly claims 2-5 and 7-11 are allowable for at least the reasons set forth above with respect to claim 1. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 2-5 and 7-11 under 35 U.S.C. § 103(a).

#### C. Claims 12-19 and 21-23

Independent claims 12 and 23 recite similar features to claim 1. Specifically, independent claim 12 recites *a selectable connection from the one of the simulatable graphical objects provided in the simulatable graphical model editor program to the portions of the*

*produced report that correspond to the one of the simulatable graphical objects, the produced report provided in a document viewer as textual content where the simulatable graphical objects represent a dynamic system for simulation and simulating the simulatable graphical objects simulates the dynamic system represented by the simulatable graphical objects.*

Independent claim 23 recites *a selectable connection from the one of the simulatable graphical objects provided in the simulatable graphical model editor program to the portions of the produced report that correspond to the one of the simulatable graphical objects, the produced report provided in a document viewer as textual content where the simulatable graphical objects represent a dynamic system for simulation and simulating the simulatable graphical objects simulates the dynamic system represented by the simulatable graphical objects.*

In light of the arguments presented above in connection with claim 1, Applicant respectfully submits that the MATLAB reference, Sotomayor and Solecki, taken either alone or in any reasonable combination, do not disclose or suggest each and every element of claims 12 and 23. Claims 13-19 and 21-22 depend from independent claim 12 and, as such, incorporate all of the elements of claim 12. Accordingly claims 13-19 and 21-22 are allowable for at least the reasons set forth above with respect to claim 12. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 12-19 and 21-23 under 35 U.S.C. § 103(a).

## II. Rejection of Claim 20 under 35 U.S.C. § 103

Claim 20 has been rejected under 35 U.S.C. §103(a) as being obvious over the MATLAB reference in view of Sotomayor and Solecki and in further view of U.S. Patent Number 7,015,911 to Shaughnessy et al (hereafter “Shaughnessy”).

Claim 20 depends from independent claim 12 and, as such, incorporates all of the elements of claim 12.

The Examiner cites Shaughnessy for the teaching of generating a report in PDF format. Shaughnessy merely concerns providing a graphical representation of data gathered from various databases. Shaughnessy generally discusses generating a report from a plurality of data sources. A data source specification indicates the data to be retrieved from the data sources so that the

report may be generated based upon the extracted data. A view specification indicates how the data is to be visually represented within the report (Abstract).

Shaughnessy is silent about a simulatable graphical model representation having one or more simulatable graphical objects. Specifically, Shaughnessy, alone or in any reasonable combination with the MATLAB reference, Sotomayor and Solecki, does not disclose or suggest *a selectable connection from the one of the simulatable graphical objects provided in the simulatable graphical model editor program to the portions of the produced report that correspond to the one of the simulatable graphical objects, the produced report provided in a document viewer as textual content where the simulatable graphical objects represent a dynamic system for simulation and simulating the simulatable graphical objects simulates the dynamic system represented by the simulatable graphical objects*, as provided in Applicant's claim 12.

Accordingly, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 20 under 35 U.S.C. § 103(a).

**CONCLUSION**

In light of the above amendments and arguments, Applicant respectfully submits that all of the pending claims are in condition for allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact the Applicant's attorney at (617) 573-4700.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-059RCE4. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

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Respectfully submitted,

By /Neslihan I. Doran/  
Neslihan I. Doran  
Registration No.: 64,883  
Nelson Mullins Riley & Scarborough LLP  
One Post Office Square  
Boston, Massachusetts 02109-2127  
(617) 202-4636  
(617) 742-4214 (Fax)  
Attorney/Agent For Applicant